

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PROTECT OUR PARKS, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 21-cv-2006
)	
PETE BUTTIGIEG,)	Hon. John Robert Blakey
SECRETARY OF THE U.S. DEPARTMENT)	
OF TRANSPORTATION, et al.,)	
)	
Defendants.)	

**PLAINTIFFS' MOTION FOR ORAL ARGUMENT ON CERTAIN DEFENDANTS'
MOTION TO DISMISS**

NOW COME the Plaintiffs and respectfully move for an oral argument on certain Defendants' motion to dismiss. In support of the motion to for oral argument, Plaintiffs state as follows:

1. On June 15, 2021, certain Defendants filed a motion to dismiss state law claims filed by the Plaintiffs. [Docket No. 28]
2. The briefing on the motion has been completed. [Docket Nos. 69 and 78-1]
3. As the Court is aware from the briefing, there are numerous and complex issues advanced by the Defendants' motion including but not limited to the arguments raised in regards to Plaintiffs' public trust claims which Defendants attempt to tie to this Court's prior rulings. Plaintiffs believe that oral argument will be of assistance to the Court in regards to resolution of the motion.
4. Plaintiffs are aware that the next hearing date before this Court is August 26, 2021 and would be prepared for oral argument on that date. Plaintiffs suggest that that oral argument

can occur by video, or if not available, by teleconference.

Wherefore, Plaintiffs respectfully request that Certain Defendants' motion to dismiss state law claims be set for oral argument on August 26, 2021, or any other mutually convenient date, by video or telephonically.

Dated this 17th day of August, 2021.

Respectfully Submitted,

Protect Our Parks, Inc.; Nichols Park Advisory
Council; Stephanie Franklin; Sid E. Williams;
Bren E. Sheriff; W.J.T. Mitchell; and Jamie Kalven

By: /s/ Michael Rachlis

One of their attorneys

Richard Epstein
16 Thomas Place
Norwalk CT 06853
Raepstein43@gmail.com

Michael Rachlis (IL Bar No. 6203745)
Rachlis Duff & Peel, LLC
542 South Dearborn Street, Suite 900
Chicago, Illinois 60605
(312) 733-3950 (gen.)
(312) 733-3952 (fax)
mrachlis@rdaplawnet.net